

EXHIBIT H

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC

Case No. 3:17-cv-00939-JCS

Plaintiff.

VS

UBER TECHNOLOGIES, INC.;
OTTOMOTTO, LLC; OTTO TRUCKING
LLC

Defendants

**PLAINTIFF WAYMO LLC'S FIRST SET
OF REQUESTS FOR PRODUCTION TO
DEFENDANTS**

Honorable William H. Alsup

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PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION TO DEFENDANTS
UBER TECHNOLOGIES, INC.; OTTOMOTTO, LLC; AND OTTO TRUCKING LLC

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiff Waymo LLC (“Waymo”) requests that Defendants Uber Technologies, Inc. (“Uber”), Ottomotto, LLC (“Ottomotto”), and Otto Trucking LLC (“Otto Trucking”) (collectively “Defendants”), produce for inspection and copying within thirty days (30) hereof the documents set forth below at the offices

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1 Consultants List; and automation vendors that were exported by RADUTA from Google Drive on
2 or around July 28, 2016.

3 17. “LiDAR” means Light Detection and Ranging.

4 18. “DOCUMENTS” shall INCLUDE, without limitation, all written, graphic or
5 otherwise recorded material, INCLUDING without limitation, electronically stored information
6 regardless of the form of storage medium, microfilms or other film records or impressions, tape
7 recordings or computer cards, floppy disks or printouts, any and all papers, photographs, films,
8 recordings, memoranda, books, records, accounts, communications, letters, telegrams,
9 correspondence, notes of meetings, notes of conversations, notes of telephone calls, inter-office
10 memoranda or written communications of any nature, recordings of conversations either in
11 writings or upon any mechanical or electrical recording devices, INCLUDING e-mail, notes,
12 papers, reports, analyses, invoices, canceled checks or check stubs, receipts, minutes of meetings,
13 time sheets, diaries, desk calendars, ledgers, schedules, licenses, financial statements, telephone
14 bills, logs, and any differing versions of any of the foregoing, whether so denominated, formal,
15 informal or otherwise, as well as copies of the foregoing which differ in any way, INCLUDING
16 by the addition of handwritten notations or other written or printed matter of any nature, from the
17 original. The foregoing specifically INCLUDES information stored in a computer database and
18 capable of being generated in documentary form, such as electronic mail, text messages (i.e., SMS
19 messages), other electronic messages including messages sent or received via Slack, WhatsApp,
20 Google Hangouts, Facebook Messenger, and the like.

21 19. “COMMUNICATIONS” shall mean, without limitation, any transmission,
22 conveyance or exchange of a word, statement, fact, thing, idea, DOCUMENT, instruction,
23 information, demand or question by any medium, whether by written, oral or other means,
24 including but not limited to, electronic communications and electronic mail (“e-mail”).

25 20. “THING” means any tangible object, other than a DOCUMENT.

26 21. “PERSON” means to any individual, corporation, proprietorship, association, joint
27 venture, company, partnership or other business or legal entity, including governmental bodies and

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1 agencies. The masculine includes the feminine and vice versa; the singular includes the plural and
2 vice versa.

3 22. “REGARDING,” shall mean relating to, referring to, mentioning, reflecting,
4 pertaining to, evidencing, involving, describing, discussing, commenting on, embodying,
5 responding to, supporting, contradicting, or constituting (in whole or in part), as the context makes
6 appropriate.

7 23. “INCLUDE” and “INCLUDING” shall mean including without limitation.

8 24. Use of the singular also INCLUDES the plural and vice-versa.

9 25. The words “or” and “and” shall be read in the conjunctive and in the disjunctive
10 wherever they appear, and neither of these words shall be interpreted to limit the scope of these
11 Requests for Production.

12 26. The use of a verb in any tense shall be construed as the use of the verb in all other
13 tenses.

14 27. The term “any” shall include “all” and “all” shall include “any.”

INSTRUCTIONS

15 The following instructions shall apply to each of the Requests herein:

16 1. In answering the following Requests, furnish all available information, including
17 information in the possession, custody or control of any of DEFENDANTS’ attorneys, directors,
18 officers, agents, employees, representatives, associates, investigators, divisions, affiliates,
19 partnerships, parents, subsidiaries and PERSONS under DEFENDANTS’ control, who have the
20 best knowledge, not merely information known to DEFENDANTS based on DEFENDANTS own
21 personal knowledge. If DEFENDANTS cannot fully respond to the following Requests after
22 exercising due diligence to secure the information requested thereby, so state, and specify the
23 portion of each Request that cannot be responded to fully and completely. In the latter event, state
24 what efforts were made to obtain the requested information and the facts relied upon that support
25 the contention that the Request cannot be answered fully and completely; and state what
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